

TROY A. ARCHIE, ESQ.

Attorney at Law

339 Front Street-Suite A

Camden, New Jersey 08102

(856) 964-5300

Attorney for Plaintiff Lareen Blakney-Reed

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY

LAREEN BLAKNEY-REED,	:	CIVIL ACTION NO.: 07-CV-1007 (NLH/KMW)
	:	
	:	CAMDEN COUNTY
	:	
v.	:	
	:	
CITY OF CAMDEN,	:	MOTION TO VACATE DISMISSAL
	:	AND REOPEN ACTION PER
.	:	Fed.R.Civ.P 60(b)
	:	

TO: Ralph Kramer, Esquire
605 White Horse Pike
Haddon Heights, NJ 08035

Lewis Wilson, Esquire
City Attorney
Law Department
520 Market Street
City Hall, Room 419
P.O. Box 95120
Camden, New Jersey 08101-5120

PLEASE TAKE NOTICE that the Plaintiff, Lauren Blakney-Reed through her attorney Troy A. Archie, Esquire is seeking permission from the Court to Vacate The Order of Dismissal dated October 30, 2009 and reopen the within matter and list it for trial because the proposed settlement has been rejected and consummated.

Plaintiff will rely on the attached certification of counsel.

S/ Troy A. Archie

TROY A. ARCHIE, ESQUIRE
Attorney for Plaintiff,
Lareen Blakney-Reed

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Attorney for Plaintiff Lareen Blakney-Reed

UNITED STATES DISTRICT COURT
FOR THE
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LAREEN BLAKNEY-REED,	:	CIVIL ACTION NO.: 07-CV-1007 (NLH/KMW)
	:	
	:	CAMDEN COUNTY
	:	
v.	:	
	:	
CITY OF CAMDEN,	:	CERTIFICATION OF
	:	COUNSEL
	:	
	:	

Troy A. Archie, Esquire attorney for plaintiff hereby certifies the following:

1. I am the attorney of record in this matter and as such am familiar with the facts here in.
2. On or about October 26, 2009 the undersigned met with Defense Counsel and discussed a settlement.
3. I immediately had my office contact the Plaintiff regarding settlement and was informed the settlement was accepted.
4. Shortly thereafter, the Plaintiff has been demanding her file (yet never picked it up) and advised my office that she was told her claim was worth well over \$1,000,000.00
5. The Plaintiff has also had another attorney write me a letter threatening an ethics complaint on lawsuit against me if I don't take the case to trial.
6. Though the undersigned is unnerved by the Plaintiff's actions, she obviously now believes that her claim is worth more than the agreed upon settlement and wishes the case to be tried on the merit.

7. Based on the above and the fact that the settlement has not been consummated I believe it is in the best interest of the Plaintiff to go to trial whether it is with the undersigned or presently new counsel that Plaintiff is seeking.
8. Wherefore, the undersigned is respectfully requesting the court to reopen this matter and list same for a scheduling conference and trial.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully submitted,

s/ Troy A. Archie

TROY A. ARCHIE, ESQUIRE
Attorney for Plaintiff,
Lareen Blakney-Reed

TROY A. ARCHIE, ESQ.

Attorney at Law

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Camden, New Jersey 08102

(856) 964-5300

Attorney for Plaintiff Lareen Blakney-Reed

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY

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	:	
	:	CAMDEN COUNTY
	:	
v.	:	
	:	
CITY OF CAMDEN,	:	ORDER
	:	
.	:	
	:	

THIS MATTER being opened to the Court by Troy A. Archie, Esquire on behalf of
Plaintiff Lareen Blakney-Reed and for good cause shown,

IT IS ON THIS _____ day of _____ 2010,

ORDERED:

That plaintiff's motion to Vacate the Order of Dismissal dated October 30, 2009 and to
reopen this matter and list it for a scheduling conference and trial is hereby,

_____ GRANTED

_____ DENIED.

HON. NOEL L. HILLMAN, USDJ